

THE RAMEAU LAW FIRM

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November 12, 2015

VIA ECF

Honorable Marilyn D. Go
United States Magistrate Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: Angela Hollins v. City of New York, et al., 14 CV 6519 (WFK)(MDG)

Your Honor:

I represent the plaintiff in the above-captioned action. I write to request a second extension of time from November 14, 2015 to January 15, 2016 to complete discovery. Plaintiff also requests a brief adjournment of the telephone status conference that is currently scheduled for November 17th at 10:30 a.m. The defendants do not oppose either request.

First, the extension is needed to allow the parties to conduct additional discovery in this case. The plaintiff was deposed on November 5th. The plaintiff intends on deposing the defendants and the defendants have indicated a willingness to depose one of plaintiff's witnesses.

Second, the reason why the parties are requesting a longer extension is because defense counsel is set to begin a three-day trial on December 14th in the case of Christina Selvaggio v. P.O. Lestrade, et al., 13 Civ. 2436 (NGG) (RML) with accompanying pre-trial submissions and motions due around Thanksgiving. Thereafter the parties run into the December holiday period. The extension will also allow the parties the opportunity to try to resolve the case while they continuing to conduct discovery.

Finally, the reason why plaintiff is requesting a brief adjournment of the telephone status conference is because plaintiff's counsel currently has a scheduling conflict with a conference in the Court of Claims.

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We thank the Court for its consideration of this request.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Afsaan Saleem', with a stylized flourish extending from the end.

Afsaan Saleem, Esq.

cc: ACC Rosemarie Y. Nam